

AUSA Marcia S. Cohen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
-v-	:	Violations of 18 U.S.C. § 2251(a)
	:	and (e), 2252A(a)(2)(B) and (b)(1)
	:	
THOMAS JAMES PUCCINI,	:	COUNTY OF OFFENSE
	:	Westchester
Defendant.	:	
	:	
	:	
-----	X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS WOODBURN, being duly sworn, deposes and says that he is a Task Force Officer with Homeland Security Investigations ("HSI") and charges as follows:

COUNT ONE
(Sexual Exploitation of a Child)

1. In or about November 2021, in the Southern District of New York and elsewhere, THOMAS JAMES PUCCINI, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, PUCCINI directed a 17-year-old male ("Victim-1") in Westchester County, New York to take sexually explicit images of Victim-1 and transmit them to him via the internet.

(Title 18, United States Code, Section 2251(a) and (e)).

COUNT TWO
(Sexual Exploitation of a Child)

2. On or about January 18, 2017, in the Southern District of New York and elsewhere, THOMAS JAMES PUCCINI, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would

be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, PUCCINI directed a 13-year-old male ("Victim-2") in Westchester County, New York to take sexually explicit images of Victim-2 and transmit them to him via the internet.

(Title 18, United States Code, Section 2251(a) and (e)).

COUNT THREE

(Sexual Exploitation of a Child)

3. On or about January 10, 2023, in the Southern District of New York and elsewhere, THOMAS JAMES PUCCINI, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, PUCCINI, while in Westchester County, New York, directed a 16-year-old male ("Victim-3") to take sexually explicit images of Victim-3 and transmit them to PUCCINI via the internet.

(Title 18, United States Code, Section 2251(a) and (e)).

COUNT FOUR

(Receipt and Distribution of Child Pornography)

4. On or about June 11, 2023, in the Southern District of New York and elsewhere, THOMAS JAMES PUCCINI, the defendant, knowingly received and distributed material containing child pornography that had been mailed, and using means and facilities of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, while PUCCINI was in Westchester County, New York, he directed a male ("Victim-4") to transmit to PUCCINI, via the internet, sexually explicit images of Victim-4 that had been taken when Victim-4 was a minor.

(Title 18, United States Code, Sections 2252A(a)(2)(B)
and (b)(1).)

5. I am an investigator with the Westchester County District Attorney's Office ("WCDAO") and a Task Force Officer with HSI, currently assigned to HSI's Field Office in New Windsor, New York. I have been a Task Force Officer with HSI since March 2025. I

have participated in numerous investigations into the production, receipt, possession, and/or distribution of child pornography by electronic means. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

6. On October 25, 2024, in my capacity as a WCDAO Investigator, I spoke with a detective ("Detective-1") of the Eastchester Police Department regarding an investigation concerning THOMAS JAMES PUCCINI ("PUCCINI"), the defendant, and I reviewed his report concerning such investigation. Based on my conversation with Detective-1 and my review of the report, I learned that, on or about October 23, 2024, a 20-year-old individual ("Victim-1") reported that he had been extorted by PUCCINI. Victim-1 reported that PUCCINI had been his football coach when he attended a high school ("School-1"), in a school district ("District-1") in Westchester County, New York.

Victim-1

7. On or about October 29, 2024, I spoke with Victim-1, who told me the following, in substance and in part:

a. Victim-1 played football for School-1. In his 9th and 10th grades, Victim-1 played junior varsity football. When Victim-1 was in 10th grade, THOMAS JAMES PUCCINI, the defendant, was one of Victim-1's football coaches. In or about late August or early September of 2019, PUCCINI drove Victim-1 from practice to Victim-1's home in the Bronx. At that point, Victim-1 knew that PUCCINI now knew that Victim-1 lived outside District-1, even though students were required to live within District-1 to attend School-1.

b. In or about November 2021, when Victim-1 was 17 years old, he received, on Victim-1's burner Snapchat account¹, a friend request from an individual using the Snapchat screen name "alex_fundi2." Victim-1 accepted the friend request. After accepting it, Victim-1 received a nude image of a female from "alex_fundi2" and believed that he was communicating with a female. "She" told him that she knew him and went to School-1. Victim-1 sent "her" nude photos of himself, including photos showing his penis.

c. During the communications that ensued, "alex_fundi2" sent multiple sexually explicit photographs of herself and said that she would send Victim-1 money in exchange for additional sexually explicit photos and videos of Victim-1. Victim-1 sent nude photos of himself to "alex_fundi2" for approximately a week or two before blocking the "alex_fundi2" account.

¹ I am aware, based on my experience, that a burner Snapchat account is a temporary or anonymous account that some Snapchat users create, often to keep someone's main account or personal information separate from other activities or interactions. Burner accounts are, generally, not linked to the user's real identity or primary Snapchat account and are used for privacy, anonymity, and/or to engage in activities without connecting these activities to the user's primary online presence.

d. About a week or two later, Victim-1 began receiving, on Victim-1's primary Snapchat account, messages from THOMAS JAMES PUCCINI, the defendant. PUCCINI used a Snapchat account with the display name, "tommytuts66," a Snapchat account Victim-1 knew to belong to PUCCINI, the defendant. Among other things, PUCCINI told Victim-1, in sum and substance, "I need you to keep a secret" and "remember I kept your secret." PUCCINI reminded Victim-1 that he had driven Victim-1 home to the Bronx. Victim-1 understood PUCCINI's references to Victim-1's "secret" to be references to the fact that PUCCINI knew that Victim-1 lived outside District-1. PUCCINI sent Victim-1 a screenshot of Victim-1's burner Snapchat account that Victim-1 had used to communicate with "alex_fundi2." PUCCINI told Victim-1 that "word on the street is your friend likes to send nudes."

e. After PUCCINI showed Victim-1 that PUCCINI knew about Victim-1's burner account, Victim-1 began receiving messages and small amounts of money, between \$1 and \$5, via CashApp from a user using the CashTag "\$JS12335" ("CashTag-1"). The display name that appeared with CashTag-1 was "J S." The messages from CashTag-1 directed Victim-1 to add "alex_fundi2" back, and, among other things, referred to Victim-1's "secret," stated, "I have your pics and vids," and told Victim-1 to "add me or I send your pics."

f. Victim-1 unblocked "alex_fundi2" and sent "alex_fundi2" sexually explicit images of Victim-1. Victim-1 continued to send sexually explicit images to "alex_fundi2" until in or about 2023, when Victim-1 was a freshman in college.

g. In or about 2023, PUCCINI, via his "tommytuts66" account, reached out to Victim-1 on Snapchat. During these communications, PUCCINI, the defendant, offered Victim-1 money to meet PUCCINI in person and engage in sexual acts. Specifically, PUCCINI offered to pay Victim-1 a specific amount to masturbate Victim-1 and a higher amount in exchange for Victim-1 to anally penetrate PUCCINI. Victim-1 did not agree to meet.

8. I am aware that CashApp is a digital wallet application owned by Block, Inc. CashApp allows users to electronically transfer money from one CashApp user to another. Users can request money from, and transfer money to, other CashApp accounts via phone number, email, or "cashtags," which are unique handles that start with "\$." During the initiation of a funds transfer, a user may send a message along with the transfer of funds so that the recipient will see the message as well as the dollar amount. Many of CashApp's features are free to use. CashApp users can keep a balance in their CashApp accounts or they can "cash out," or liquify, funds received via CashApp. Funds can be cashed out through, among other things, transfers to associated third-party bank accounts or to debit cards (called Cash Cards) administered by Block, Inc.

9. Based on my review of records from Snapchat relating to the account, "tommytuts66," I am aware that this account was opened on November 1, 2012, and is associated with a gmail email address beginning with "tpuccini" ("Email-1"). Snapchat's records also indicate that the "Tommytuts66" account has also been associated with another email beginning "tompooch" ("Email-2"). Further, the records reveal that the display name for the "Tommytuts66" account has changed several times, and has included the following: "Pooch,"

"Tom Pooch," "Tom Puccini," and "Tom P." The associated date of birth for the user of the account is a date in 1996 ("DOB-1").

10. Based on my review of personnel records from District-1, I am aware that DOB-1 is the date of birth of THOMAS JAMES PUCCINI, the defendant. Based on his date of birth, PUCCINI is currently 28 years old.

11. The records from Snapchat relating to the "tommytuts66" account contain various Internet Protocol ("IP") addresses used by "tommytuts66" to access the account. One IP address ending in 245 ("IP-1") accessed the account over 14,000 times.

12. I have reviewed records from the company who owns IP-1. Based on my review of these records, I am aware that IP-1 has been assigned to an address in Westchester County ("Address-1") since at least May 16, 2023. The email address associated with the subscriber of the account is Email-1. Based on this investigation, I am aware that Address-1 is the residence of THOMAS JAMES PUCCINI, the defendant.

13. Based on my review of records from Snapchat relating to the "alex_fundi2" Snapchat account, I am aware that this account was created on April 7, 2021 and associated with an email that begins with "puccini01" and ends in "edu" ("Email-2"). The records indicate that the display name was changed numerous times and included "Young & Horny," "Young NY Vers Bottom Horny," "Zach," "Alexandra Fundi," "Alex Fundi," "Horny Twink," and "zach_parker0," as well as two other display names containing full names (*i.e.*, first and last names) that I recognize, based on my investigation, to be the names of two former students at School-1 and several display names that appear to refer to those two former students' names. Based on my experience, I know that the user of a Snapchat account chooses his or her display name and can change it at will.

14. The records from Snapchat relating to the "alex_fundi2" account reveal that IP-1 was used over 13,000 times to access the "alex_fundi2" account. Further, Email-1 is associated with the "alex_fundi2" account. The records also indicate that, on at least one occasion in February 2024, the "alex_fundi2" account was accessed from IP-1 by a device identified as an "iPad8,5; iOS 15.4.1." I am aware, based on my training and experience, that "iPad8,5; iOS 15.4.1" refers to an iPad Pro 12.9 inch 3rd Generation with WiFi.

15. I have reviewed CashApp records for CashTag-1. These records indicate that CashTag-1 was created on or around July 29, 2021, and that the user provided the name "Thomas Puccini" and DOB-1. The email addresses associated with the account include Email-2. The address associated with CashTag-1 is Address-1, PUCCINI's residence. The CashApp records for CashTag-1 reveal that there were approximately 339 transactions between July 29, 2021 and May 2, 2024, and that these transactions resulted in the payment by CashTag-1 of over \$9,000 to other Cash App users. These 339 transactions include both attempted and cancelled transactions as well as completed transactions. Further, these 339 transactions include approximately 47 transactions between CashTag-1 and Victim-1 between on or about November 6, 2021 and in or about March 2024.

16. Based on my review of the display names of the users with whom CashTag-1 engaged in transactions and my review of open-source records, I believe that CashTag-1 engaged in financial transactions with at least ten individuals who were, at the time of the transactions, either former or current students of School-1. Further, the CashApp records indicate that, on or about January 29, 2023, CashTag-1 sent \$1 to a user with the message, "I want gf young bro stuff. dm me@JohnSmi50809926." Based on my experience, I believe that "young bro stuff" is a reference to young males engaging in sexual acts.

17. The records for CashTag-1 also reflect that, between on or about October 16, 2023 and on or about October 17, 2023, CashTag-1 received six transactions from a CashApp account ("CashTag-2"), each for \$1, with messages including: "a 17 year olds suicide is on u im bouta be exposed," "just talk to me I can't force you to do anything," TALK TO ME THATS ALL I ASK YOU OWE ME AT LEAST THA," "I'm begging you to answer at least talk to me," "I'm gonna get outed please respond," and "if you ever cared about me respond." On or about January 13, 2025, I spoke with a 17-year-old student ("Student-1") in Illinois who identified CashTag-2 as his CashApp account. Student-1 stated that he sent sexually explicit images of himself to "alex_fundi2" via Snapchat and that he sent the images at "alex_fundi2"'s request and because "alex_fundi2" promised to pay him for them. At the time Student-1 took and sent "alex_fundi2" the photos, he was 16 years old.

18. On or about October 31, 2024, the WCDAO obtained a search warrant authorizing a search of Address-1, PUCCINI's address, as well as a search of PUCCINI's person. On November 1, 2024, other WCDAO investigators and I executed the search warrant. Among the items seized were PUCCINI's iPhone ("Phone-1") and PUCCINI's Apple iMac desktop computer ("Desktop-1"). PUCCINI was present at Address-1 at the time of the search and was arrested.

19. Following his arrest, THOMAS JAMES PUCCINI, the defendant, was charged in New York with Grand Larceny in the Fourth Degree, in violation of New York Penal Law § 155.30(6), and arraigned in White Plains City Court on behalf of the Town of Eastchester Justice Court. He was released on his own recognizance.

20. I am aware that, on or about November 1, 2024, an Investigator with the WCDAO ("Investigator-1"), who is specially trained in the forensic analysis of digital evidence, created Extraction-1, which contains the complete contents of Phone-1. On or about November 7, 2024, Investigator-1 created Extraction-2, which contains the complete contents of Desktop-1.

21. On or about November 1, 2024, I spoke with the Security Director ("Director-1") for District-1. Director-1 advised me, in substance and in part, that THOMAS JAMES PUCCINI, the defendant, was the interim athletic director for District-1, had held that position since July 2024, and had an office at School-1. Director-1 advised that, upon learning about PUCCINI's arrest, Director-1 removed various items from PUCCINI's office including an Apple iPad Model A1876.

22. Based on my review of information from Apple concerning the Apple iPad Model A1876, I am aware that this iPad is an iPad Pro 12.9 inch 3rd Generation with WiFi, the same

model of iPad that, according to the Snapchat records, logged into the Snapchat account “alex_fundi2” from Address-1.

Victim-2

23. On or about November 7, 2024, and on a number of occasions thereafter, I spoke to a 21-year-old male (“Victim-2”) who told me the following, in substance and in part:

a. In or about 2016, when Victim-2 was 13 and in 8th grade, he and other middle-schoolers worked out in School-1’s high school weight room to prepare for Junior Varsity football. He and the other middle-schoolers were supervised by THOMAS JAMES PUCCINI, the defendant. PUCCINI told him and the other middle-schoolers that his Instagram and Snapchat handles were “tommytuts66.”

b. Beginning while Victim-2 was still 13 years old and in eighth grade, PUCCINI communicated with Victim-2 through Snapchat and requested that Victim-2 take and send PUCCINI photos and videos of Victim-2’s penis. PUCCINI also sent Victim-2 photos of his penis. PUCCINI specified exactly what he wanted Victim-2 to show him, and, based on his instructions, Victim-2, on numerous occasions, took and sent PUCCINI photos and videos showing various angles of Victim-2’s penis, showing Victim-2 masturbating, showing Victim-2 “finishing” (*i.e.*, ejaculating) with the audio on, and showing Victim-2 laying with his semen on his chest. On numerous occasions, at PUCCINI’s request, PUCCINI and Victim-2 would “race” to see who could masturbate to ejaculation first. The winner would have to send a video or photo capturing the “finish.”

c. In September 2017, when Victim-2 was 14, Victim-2 was walking home from a school event and PUCCINI, the defendant, pulled up alongside him and asked if he needed a ride. Victim-2 got into PUCCINI’s car. PUCCINI asked if Victim-2 wanted to hang out, and Victim-2 agreed. PUCCINI drove Victim-2 to Address-1 and, once inside the house, invited Victim-2 to sit on his bed with him. PUCCINI began to touch Victim-2’s shoulder and upper body while commenting about how “big” Victim-2’s penis was for “being a 14-year-old kid.” PUCCINI pressed Victim-2 to show his penis to PUCCINI. After Victim-2 said no, PUCCINI told Victim-2 that he was going to get some water and snacks and that he was going upstairs to say goodnight to his parents. While PUCCINI was upstairs, Victim-2 ran away from the house.

d. Following the event at PUCCINI’s house, Victim-2 and PUCCINI continued to communicate via Snapchat. In total, Victim-2 and PUCCINI shared more than a hundred photos and videos with each other.

24. On April 24, 2025, the Honorable Andrew E. Krause, United States Magistrate Judge, authorized a search of, among other things, Phone-1 and Desktop-1 and Extraction-1 and Extraction-2 for evidence relating to federal offenses including sexual exploitation, enticement and child pornography.

25. The search of Desktop-1 is still ongoing, but, to date, I am aware that Desktop-1 contains what appears to be a backup of an iCloud (“Cloud-1”) associated with Email-1 that

contains, among other things, at least one million texts spanning from in or about September 2013 to on or about December 11, 2020. In numerous texts, the user of Cloud-1 identifies himself as "Pooch" and/or "Tom Puccini."

26. The texts on Desktop-1 include over 8000 messages between Cloud-1 and Victim-2 between January 2017 and December 2020. These messages include hundreds of messages in which PUCCINI refers to masturbating, to Victim-2's penis, and/or requests that Victim-2 take and send him photos of his penis. For example, the messages include the following:

a. On or about January 18, 2017, at approximately 10:18 p.m., Cloud-1 messaged Victim-2, "Going straight into jerking if you wanna race?" At 10:25 p.m., Cloud-1 said, "Alright I'm about to send you a snap... make sure no one else sees it but you... idk the friendship you wanna have (yes I deff wanna have a lasting friendship with you) but I don't mind a pretty open friendship so if that includes a few funny snaps every now and again (like the one I just sent) then so be it... but please be straight up, if that's not something you're comfortable with please tell me." At 10:27 p.m., Victim-2 replied, "who else did u send that too." Cloud-1 said, "Just you, thought it was funny since we openly talk about jerking so much" and "If that's not something you're comfortable with please tell me." After Victim-2 responded that it was "fine," Cloud-1 said, "You'll send funny ones like that back? Or..." and "Like just for example something I would find funny is if you sent one back of yours soft with the caption, 'waiting for the dog to move so I can stroke the snake' or something like that I would have found funny." When Victim-2 responded with a smily face emoji, Cloud-1 said, "Do it now, make me laugh lol... but use a diff caption." At 10:31 p.m., Cloud-1 said "Think of a funny caption." A minute later, at 10:32 a.m., Cloud-1 told Victim-2, "Lmao it rhymed! 😂😂." Victim-2 responded, "😂." At approximately 10:33 p.m., Cloud-1 said, "Now at night we should both be cautious of where we are when we open each other's snaps lol."

b. About an hour later, on or about January 18, 2017, at approximately 11:24 p.m., Cloud-1 said, "So, random but... I didn't think you would have a big dick... I never see a bulge in your pants (as a workout instructor you'd be surprised hm you look at the crotch while spotting or watching exercises) anyway I never saw a bulge so I didn't think you had a big one." At 10:32 p.m., Cloud-1 said, "I like the fact that our friendship is so new and we're already so open with each other" and "Like I've said.. I feel like I've known you for years."

c. On January 19, 2017, at approximately 9:14 p.m., Cloud-1 told Victim-2 that "id like to race you later 😂." Victim-2 responded, "no phone tonight" and "sorry can't race."

d. On January 21, 2017, at approximately 1:20 a.m., Cloud-1 asked, "Is it possible for you to sneak out ever?" Victim-2 told him that his door "beeped" when opened and that, to get out, he would have to go out a window. Cloud-1 asked, "Would you ever?"

e. On January 22, 2017, at 12:13 a.m., Cloud-1 asked, "Race?" At 12:48 a.m., Cloud-1 said, "Ready to race?" and at 12:50, "Now's good" and "Lmk when you start." Victim-2 then sent messages saying, "3," "2," "1," and "go." Cloud-1 said, "First one to snap the finish wins." At 1:02 a.m., Cloud-1 asked, "R you close to finishing?" When Victim-2 responded,

“done,” Cloud-1 asked, “You make a lot?” At 1:03 a.m., Cloud-1 said, “Show if you can, if it's hard to do nbd.”

f. On or about June 17, 2017, at approximately 12:46 a.m., Cloud-1 asked, “Did you jerk it today?” At approximately 12:49 a.m., Cloud-1 said, “Lemme see it again.” When Victim-2 responded, “No,” Cloud-1 said, “It's just to me tho, and I don't want you to get hard” and “I wanna see if it's actually that big.” At approximately 1:00 a.m., Cloud-1 told Victim-1, “Delete the messages” and “Don't let anyone see that snap.”

27. Based on my review of Desktop-1, I am aware that the back-up for Cloud-1 contains, in the Notes, an entry created on or about December 13, 2018 that was last modified on September 22, 2024. The entry is titled “Phone Codes” and lists what appears to be 19 male names, some of which include a first and last name, some of which include a first name only, and some of which are first names followed by an initial. Following each of the names are various numbers. 18 of the numbers are either 6 digits or 4 digits and one of the numbers is 11 digits. Based on my experience and training, I am aware that Apple phone passcodes are either 4 digits or 6 digits, and Samsung phone passcodes can be 11 digits. Based on my review of the male names and my review of open-source documents, I am aware that at least five of the names that include both a first and last name are names of individuals who were, at some point between December 2018 and March 2024, current students at School-1. Further, I am aware that several of the names that appear in the Note were, at some point, display names for the “alex_fundi2” account.

28. In or about November 2024, I spoke to Male-1, who was a student at School-1 from in or about 2015 to 2019. Male-1 told me, in substance and in part, that THOMAS JAMES PUCCINI, the defendant, requested, on numerous occasions, that he take and transmit images of his penis to PUCCINI. Cloud-1 contains thousands of messages between Cloud-1 and Male-1. In more than 100 messages, Cloud-1 referred to Male-1's penis and/or requested images of Male-1's penis. For example, the messages from Cloud-1 to Male-1 include the following:

a. On January 11, 2016, at approximately 11:50 p.m., Cloud-1 asked, “Have you measured your dick yet??” When Male-1 responded that he had not, Cloud-1 asked, “Is it shorter or longer than the length of your phone?” Male-1 responded that it was longer, and Cloud-1 asked, “How much longer is it than your phone do u think?” Thereafter, at approximately 12:00 a.m., Cloud-1 told Male-1, “Wow dude. You've got an impressive dick then haha” and “R u ready to show it yet?” At approximately 12:03 a.m., Cloud-1 asked, “Just not comfortable showing it yet? By the sounds of it it's really good sized so idk if your self conscious about it being big enough....”

b. On August 29, 2016, at approximately 9:58 p.m., Cloud-1 said, “[First name of Male-1], I wanna see your dick... There I said it. Idk why, but I really wanna see it. Idk how to explain it to you, but that's how I feel. I sneak some peaks at practice at your bulge and I'm sure you've noticed by now. I don't know why I feel this way, but I wanna see it.... There I said it.” At approximately 10:09 p.m., Cloud-1 said, “Would you show me it buddy? Ik this isn't normal 😏.” At approximately 10:11 p.m., Cloud-1 said, “It'd be just to me tho buddy, and I'd never ever tell anyone” and, at 10:12 p.m., “We wouldn't even have to talk about it after you did it.”

At approximately 2:13 a.m., after Male-1 responded, "I don't do that," Cloud-1 said, "Would you do anything? Like wb if you had boxers on?" and "Or just anything in general 🙄." At 10:15 p.m., Cloud-1 added, "I know this is wrong for me to ask you and I can't control this."

c. On July 4, 2017, at approximately 11:10 p.m., Cloud-1 told Male-1 that he had "fully grabbed your cock today in the pool, on accident, but it still happened." Cloud-1 continued, "I feel like it was big.... how big is it usually soft?" When Male-1 said he didn't know, Cloud-1 said, "Can you measure it soft and hard again?" At 11:18 p.m., Cloud-1 asked, "When can I see it? Like no bs, when can I see it?" At 11:21 p.m., he added, "I think I've been really patient with it and I think we're close enough now" and at 11:22 p.m., "Please bro, it's just me and you." When Male-1 continued to refuse, Cloud-1 told him, at 11:30 p.m., "I don't understand why," and at 11:31 p.m., "I'm not asking to fucking suck you off or something, lit 2 snapchats of your dick that will disappear after 10 seconds." Cloud-1 added, "I practically see it soft every day BC of your bulge." At 11:33 p.m., Cloud-1 said, "Have I every done anything to hurt you? No I haven't; I think you're making it into a bigger deal than it is."

d. On June 21, 2018, at approximately 12:03 p.m., Cloud-1 said, "Also can I tell you something? It was too awkward for me to say in person lol." At approximately 12:05 p.m., Cloud-1 said, "I notice that you like to like roll your shorts up and make them Shorter, especially in football... but when you do that, you're literally making your entire cock press against the front of your shorts and you can see the entire thing, including the head; just wanted to let you know... and it was too awkward for me to say in person lol." Cloud-1 continued, "Like a clear 4-5" cock was visible yesterday" and "You also must have a ginormous dick too for it to be that big soft."

29. I am aware that Cloud-1 contains thousands of messages between Cloud-1 and a male ("Male-2") that span from on or about August 2015 to December 2020. In numerous messages, Cloud-1 requested that Male-2 send him images of Male-2's penis. In or about November 2024, I spoke to Male-2, who was a student at School-1 from in or about 2015 to 2019. Male-2 told me, in substance and in part, that THOMAS JAMES PUCCINI, the defendant, requested, on numerous occasions, that he take and transmit images of his penis to PUCCINI. Male-2 provided me with his snapchat user name.

30. On or about November 19, 2024, WCDAO obtained a search warrant for the content and other information associated with the "alex_fundi2" Snapchat account. On December 6, 2024, Snapchat provided the WCDAO with the requested content and information. On May 6, 2025, the Honorable Andrew E. Krause authorized a search of this content and information for evidence related to offenses including sexual exploitation and enticement.

31. Based on my review of the Snapchat content and information associated with the "alex_fundi2" account, I am aware that, between on or about February 23, 2022 and on or about March 7, 2022, there were approximately 94 messages between "alex_fundi2" and a Snapchat user ("User-1"). Based on my review of these messages, I am aware that, on February 23, 2022 at approximately 6:10 p.m., "alex_fundi2" asked User-1, "Can I give you a snapchat to add and you try to get pics/vids from the account?" User-1 responded, "Sure" and "I don't mind being yo undercover bud." In response, "alex_fund2" transmitted Male-2's snapchat user name.

Victim-3

32. Based on my review of the Snapchat content and information associated with the “alex_fundi2” account, I am aware that between on or about January 10, 2023 and on or about August 31, 2024, there were approximately 474 messages between “alex_fundi2” and a Snapchat user (“User-2”). Based on my review of these messages, I am aware that User-2 sent “alex_fundi2” over a hundred sexually explicit photos and over a hundred sexually explicit videos. Among the messages between “alex_fundi2” and User-2 are the following:

a. On January 10, 2023, at approximately 9:31 p.m., “alex_fundi2” sent a message to User-2 that said, “Hey, from Twitter.”

b. On January 10, 2023, at approximately 9:45 p.m., User-2 transmitted a photo to “alex_fundi2.” The photo is of an erect penis. The male is visible from his neck down to his thighs and appears to be sitting in a bathtub.

c. On January 10, 2023, at approximately 10:11 p.m., User-2 transmitted a video of a male to “alex_fundi2.” The video is approximately 6 seconds and depicts a male (whose face is not in the image) on a bed wearing a black T-shirt. His penis is erect and visible. The male moves one hand up and down on his penis.

d. On January 10, 2023, at approximately 11:24 p.m., “alex_fundi2” said, “If I send you for the jacket, I’m going to need you to send those 2 vids and then.... As many vids as I want and of anything that I want until Monday.” At 11:25 p.m., User-2 responded, “monday” and then “jesus” and then “and as long as it doesn’t involve ass stuff.” Thereafter, User-2 transmitted numerous files to “alex_fundi2” containing sexually explicit images of a male.

e. On January 17, 2023, at approximately 11:48 p.m., User-2 said, “My venmo is [Venmo Account Name].”

33. Based on my review of CashApp records for CashTag-1, I am aware that there were approximately ten CashApp transactions between CashTag-1 and a CashTag bearing the name of User-2 between January 10, 2023 and March 26, 2023. The total amount paid by CashTag-1 was approximately \$325.

34. Based on my conversations with an officer (“Officer-1”) at the Cullman County Sheriff’s Office in Cullman, Alabama and my review of reports prepared by the Cullman County Sheriff’s Office, I am aware that, on January 22, 2025, Officer-1 interviewed a 18-year-old male (“Victim-3”) who confirmed that his display name on Snapchat was User-2. Victim-3 advised, in substance and in part:

a. In or about the winter of 2023, when Victim-3 was 16 years old, Victim-3 communicated with a man on Snapchat with the display name, “alex_fundi2.” Initially, the man had followed Victim-3 on Twitter. The man requested sexually explicit images of Victim-3 in exchange for buying Victim-3 expensive items. Victim-3 transmitted photos and videos to the man and, in exchange, the man bought him things.

b. During their communications, the man also asked Victim-3 if he had any sexually explicit photos of himself when he was younger.

Victim-4

35. Based on my review of the Snapchat content and information associated with the “alex_fundi2” account, I am aware that between on or about June 7, 2023 and on or about March 25, 2024, there were approximately 390 messages between “alex_fundi2” and a Snapchat user (“User-3”). Based on my review of these messages, I am aware that User-3 sent “alex_fundi2” over a hundred sexually explicit photos and over a hundred sexually explicit videos. Among the messages between “alex_fundi2” and User-3 are the following:

a. On June 7, 2023, at approximately 11:00 p.m., “alex_fundi2” sent messages to User-3 that said, “Hey” and “from twitter.”

b. On June 7, 2023, at approximately 11:12 p.m., User-3 texted “My cash app is [“CashTag-3”].” At 11:15 am., “alex_fundi2” said, “I’m gonna pay, don’t worry.”

c. On June 7, 2023, at approximately 11:18 p.m., User-3 texted message, “That one’s is more around 16 probs.”

d. On June 11, 2023, at approximately 1:50 p.m., User-3 transmitted a photo to “alex_fundi2” (“Photo-1”). The photo shows a male from his neck down to the middle of his thighs. The male is naked and wearing a necklace. One hand is grabbing his erect penis.

e. On June 11, 2023 at approximately 1:48 p.m., User-3 transmitted a video to “alex_fundi2” (“Video-1”). The video is approximately 21 seconds. The video depicts a male who is nude. The male’s face is visible in the video. The male is standing and facing the camera. He puts his right hand on his penis and strokes it up and down. Then, he turns around and bends over to expose his anus. He uses two hands to spread open his anus and then one hand to stroke his anus. Then he turns back to show his front, uses his hand to stroke up and down on his penis. He appears to pick up the camera and directs to his backside.

36. On or about January 19, 2025, I met with a 19-year-old male (“Victim-4”), who identified himself as User-3 and said that the communications between User-3 and “alex_fundi2” were Victim-4’s conversations with “alex_fundi2.” Victim-4 stated, in substance and in part, that:

a. He communicated with “alex_fundi2” on Snapchat using the User-3 account. He told “alex_fundi2” that he was 18 years old and “alex_fundi2” told Victim-4 that he was similarly aged.

b. “Alex_fundi2” requested sexually explicit images of Victim-4 when he was 15 or 16 and Victim-4 agreed to provide them. “Alex_fundi2” promised that he would pay him for the images but he didn’t.

37. During my meeting with Victim-4, I showed Victim-4 thumbnail images of Photo-1 and Video-1. Victim-4 stated that the thumbnail images were images of Victim-4 when he was approximately 15 years old.

38. Based on my review of Snapchat records for the "alex_fundi2" account, I am aware that, on January 10, 2023, at approximately 8:15 p.m., the user of the "alex_fundi2" Snapchat account logged into the "alex_fundi2" account from IP-1. I am also aware that, on June 11, 2023, at approximately 12:46 p.m., the user of the "alex_fundi2" Snapchat account logged into the "alex_fundi2" account from IP-1. As a result of this log-in activity, I believe that THOMAS JAMES PUCCINI, the defendant, was in Westchester County, New York on January 10, 2023 and on June 11, 2023 when he requested and received sexually explicit images from Victim-3 and Victim-4.

WHEREFORE, the deponent respectfully requests that THOMAS JAMES PUCCINI, the defendant, be arrested and imprisoned or bailed, as the case may be.



THOMAS WOODBURN
Task Force Officer
Department of Homeland Investigation

Sworn to me this 20th day of May, 2025



THE HONORABLE JUDITH C. McCARTHY
United States Magistrate Judge
Southern District of New York